

ALB/ABK
F.#2014R00151

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA,

- against -

JOSEPH VALERIO,

Defendant.

-----X

PROTECTIVE ORDER

14-CR-94 (JFB)

UPON the application of the United States Attorney for the Eastern District of New York, by Assistant United States Attorneys Allen L. Bode and Ameet B. Kabrawala, and with the consent of Anthony M. LaPinta and Leonard Lato, counsel for defendant JOSEPH VALERIO;

IT IS HEREBY ORDERED that all material produced by the government to defense counsel, pursuant to 18 U.S.C. § 3500 or marked as exhibits, in connection with the evidentiary hearing scheduled to commence on or about July 25, 2016 in the above-captioned case (the “Disclosures”) may not be copied or disseminated to anyone other than the defendant and members of the defense attorneys’ staff, including support staff and any retained investigators. To the extent that defense counsel determine that it is necessary to disseminate any of the Disclosures to a staff member or investigator, such person must be advised of this Order, made aware of his or her obligation not to copy or disseminate such material, and be directed to return such material to defense counsel at upon completion of the sentencing or appeal in this case. Further, upon completion of the sentencing and any appeal

in this case, all Disclosures and any copies thereof—whether in the possession of the defendant, defense counsel or members of the legal staff of defense counsel—shall be returned to the government.

IT IS FURTHER ORDERED that any violation of this Order, as determined by the Court, will require, in addition to any other sanction deemed appropriate by the Court, the immediate destruction of or return to the United States of the Disclosures and any copies thereof.

SO ORDERED.

Dated: Central Islip, New York
_____, 2016

THE HONORABLE JOSEPH F. BIANCO
UNITED STATES DISTRICT JUDGE
EASTERN DISTRICT OF NEW YORK